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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

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RICHARD D. WIEKING  
CLERK, U.S. DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

JST

IN RE: REQUEST FOR INTERNATIONAL  
JUDICIAL ASSISTANCE FROM THE FIRST  
CIRCUIT COURT OF LOS SANTOS, LOS  
SANTOS PROVINCE, REPUBLIC OF  
PANAMA; MATTER OF TESTATE  
SUCCESSION ELI ARGELIS DIAZ (R.I.P.)

CV 13 80 173 MISC

DECLARATION OF NEILL T. TSENG IN  
SUPPORT OF APPLICATION FOR ORDER  
PURSUANT TO 28 U.S.C. § 1782

I, Neill T. Tseng, declare:

1. I am an Assistant United States Attorney in the Northern District of California.
2. This declaration is submitted in support of the United States' application for an order pursuant to 28 U.S.C. § 1782 to collect evidence from witnesses within the jurisdiction of this Court and to take such other action as is required to execute a request made by the First Circuit Court of Los Santos, Los Santos Province, Republic of Panama, for information from Bank of America at 2200 Chestnut Street in San Francisco, California; from Citibank in San Jose, California; and from Citibank in San Francisco, California. A true and correct copy of the request from the Panamanian court is attached to the United States's application as Exhibit "A".
3. By letter dated July 11, 2013, addressed to Bank of America Chestnut Street, 2200 Chestnut St., San Francisco, CA 94123, the United States Attorney's Office requested that Bank of America provide the requested information voluntarily.

DECL. OF NEILL T. TSENG IN SUPPORT OF APPLICATION FOR ORDER PURSUANT TO 28 U.S.C. § 1782

1 4. As of the date of this declaration, the United States Attorney's Office has not received a  
2 response from Bank of America.

3 5. By letters dated July 11, 2013, addressed to Citibank, International Banking Center, 451  
4 Montgomery St., San Francisco, CA 94104, and addressed to Citibank, Ten Almaden Blvd Suite 100,  
5 San Jose, CA 95113, the United States Attorney's Office requested that Citibank provide the requested  
6 information voluntarily.

7 6. On or around August 8, 2013, the United States Attorney's Office received a letter dated  
8 August 7, 2013, from Citicorp Data System Incorporated, Litigation Support Unit, responding to the  
9 United States Attorney's Office's request.

10 Executed on August 21, 2013, at San Francisco, California. I have reviewed the foregoing and  
11 declare under penalty of perjury that it is true to the best of my knowledge and belief.

12  
13 /s/ Neill T. Tse  
14 NEILL T. TSENG